



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



June 19, 1989

Sent Certified Mail #P 701 028 551  
Return Receipt Requested

Mr. Richard Atwood  
Pratt & Whitney  
400 Main Street Mail Stop 121-02  
East Hartford, Connecticut 06108

RCRA RECORDS CENTER

FACILITY Pratt & Whitney - Main St  
I.D. NO. CTD 9906 72041  
FILE LOC. R-1B  
OTHER RDMS #2744

RE: Request for extension dated May 25, 1989

Dear Mr. Atwood:

In response to your correspondence dated May 25, 1989 regarding the April 24, 1989 Disapproval Letter for the closure/post-closure plan, I have the following comments:

1. The Connecticut Department of Environmental Protection acknowledges the receipt of information pertaining to the closure/post-closure plan on May 3, 1989 and May 16, 1989.

Although you have addressed some of our comments of the April 24, 1989 letter RE: Disapproval of closure/post-closure plan for Pratt & Whitney, Pine Street, Manchester, Connecticut, you have not addressed all of the comments. Pratt & Whitney must respond to all of the comments within fifteen days of receipt of this letter or enforcement actions may be taken.

2. The Connecticut Department of Environmental Protection acknowledges the receipt of information submitted to us on May 24, 1989 regarding a status change from Regulated to Non-Regulated on the 10,000 gallon underground storage tank located on the site.

Pratt & Whitney's request for a status change for the 10,000 gallon underground storage tank has been denied. The information submitted on May 24, 1989 is insufficient to make a demonstration that between November 19, 1980 and July 18, 1988 the aforementioned underground storage tank had never stored hazardous waste. The tank was taken out of service on July 18, 1988. Information pertaining to all tank loads leaving the facility during that period of time was not available. In addition, it must be shown that the waste entering the tank was not a hazardous waste. The information you have submitted on May 24, 1989, suggests that the waste waters collected from the three sumps and stored in the tank in question, had no corrosive characteristics as defined in 40 CFR 261.22. Although this may be the case, material from the South-West Sump Area-Process, Anodic Etch Line may have been characteristically hazardous for corrosivity and once having entered the tank, the tank is considered a regulated unit.

Phone:

165 Capitol Avenue • Hartford, Connecticut 06106

An Equal Opportunity Employer

JUN 26 1989

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Pratt & Whitney  
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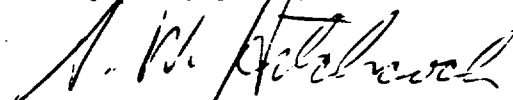
Since you have not been able to make that demonstration, the 10,000 gallon underground storage tank will remain a regulated unit and Pratt & Whitney will be required to close the unit in accordance with Section 22a-449(c)-29 of the Connecticut Hazardous Waste Regulations and 40 CFR Subpart G and Subpart J.

3. During the May 3, 1989 meeting, there was agreement that if a conclusive demonstration could be made that no historic groundwater contamination occurred due to tank leakage or overflow, the requirement for a comprehensive groundwater monitoring program could be reduced or waived.

The groundwater-related information forwarded to the Groundwater Monitoring Section consisted of a site plan, summary of the basic geology/hydrology of the area and information regarding off-site drilling. No evidence was presented which supported the conjecture of no potential historic groundwater degradation. Consequently, within 15 days of receipt of this letter, a phased on-site groundwater investigation proposal to gather data to support the clean closure demonstration and/or form a basis for post-closure groundwater monitoring program design must be submitted as part of an updated closure/post-closure plan.

In the future, please submit two copies of all transmittals to the DEP to facilitate the review process. If you have any questions concerning these comments, please contact Patricia Gray at 566-4869 or Mark Bamberger regarding groundwater issues at 566-1847.

Very truly yours,



Stephen W. Hitchcock,  
Director

Hazardous Materials Management Unit

SWH:PG:MJB:et

cc: Charles Franks, USEPA, Region I  
Stanley Alexander, Fuss & O'Neill